

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Annual Assessment of the Status of	)	MB Docket No. 12-203
Competition in the Market for the	)	
Delivery of Video Programming	)	

**COMMENTS OF  
THE ALLIANCE FOR COMMUNITY MEDIA**

**The Alliance for Community Media** (“Alliance”) submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

The Alliance serves as the national voice for local public, educational and governmental cable channels (referred to as “PEGs”, or “community media centers”) and the citizens they serve. The Alliance’s activities include providing advocacy and training to assist in the preservation of local non-commercial media for our nation’s communities and families.

It is important to remember that community media centers are non-commercial mission-based organizations that provide a wide array of services and programming for local communities. Most community media centers manage one or more cable channels and are “public access” channels carried by the majority of cable television systems as well as some telecommunications companies. In recent years, community media has expanded its local production and distribution services to non-commercial and low power radio, Internet streaming,

podcasts, social media and mobile applications. In many parts of the country, community media serves as the only remaining source local news and information. Community media centers also provide workforce development training, public safety information, and media services to area non-profits and individuals. In addition, community media centers often serve as the “launching pad” for people seeking media careers. The workforce, board and management of media centers are much more reflective of their diverse communities than that of local broadcasters or other media outlets.

In a rapidly evolving media landscape, few local resources for relevant and trusted news and information remain available. It is critical that FCC policies and rules foster the ability of community media centers to assure responsiveness to local needs and encourage diversity of local information sources and services. Community media centers deliver, on average, more than 1,100 original hours of programming every year to the communities they serve, with some centers delivering more than 10,000 hours of programming every year (See Attachment A – Buske Group Programming Survey). This programming is often in addition to education and outreach services, workforce development training, and public safety awareness provided by our members.

Alliance members also provide youth media and digital literacy training that is not available elsewhere. The FCC’s 2011 report “Information Needs of Communities” outlined many of the services and programming provided by PEG media centers, and further recommended that community media centers consider expanding their mission to include teaching digital literacy, partnering with other institutions that provide nonprofit programming, and working to increase the transparency of government and other civic institutions. We agree.

The Alliance has elevated youth media and digital literacy as a core focus area, and is currently working with community media centers around the country to convene symposiums of local educators, elected officials, businesses, media/arts organizations and the philanthropic community to improve digital literacy offerings and assess their impact on the work and life skills of youth.

Several Alliance members are exemplary leaders and key resources for news, information and youth training. By way of example --

- **BRONXNET, New York City, NY - Open 2.0** is a teen version of a BRONXNET signature series. Produced by, for, and about teens, the show addresses the concerns and interests that affect high school students in the Bronx. Working with various Bronx high schools, BRONXNET'S professional team guides and mentors the students as they write, research, host and produce. Additionally, and with support from the Pew Center for Civic Journalism, BRONXNET also has expanded its relationship with Lehman College to partner with the school's Multilingual Journalism Program.
- **OPEN MEDIA FOUNDATION, Denver, CO – OMF** offers a wide variety of training and production programs for Denver high school students. One program of note is a youth-produced talk show created by a teen dad. The 45-minute talk show was produced, written and hosted by 17-year-old TeRay Esquibel, as part of the Parent Up Denver program, which encourages young parents, through the use of new and traditional media, outreach and conversation, to support their children. All production crew positions for the program were filled by youth members of OMF's "Open Media Generation" youth production group.

- SPNN, St. Paul, MN – Set It Up is a topic-driven TV show produced by Saint Paul high school students who produce, direct, shoot, edit, and explore issues in this after-school program. Additionally, The Neighborhood Video Project, in partnership with Saint Paul community organizations, filmmakers, and historians, works with middle school-aged youth to explore the history of their neighborhoods and produce videos about each community's unique challenges and possibilities. SPNN houses a formal Youth Media Department.

- PHILLYCAM, Philadelphia, PA - PhillyCam, in partnership with YESPhilly and Voice of Philadelphia, recently launched *Pushouts*, a youth-led multimedia reporting project, which was cablecast earlier this year. *Pushouts* video documentary was researched, written, shot and edited by six YESPhilly students, and was followed by a panel discussion with the youth reporters and their media production and journalism mentors. Funded with support from J-Lab's Enterprise Reporting Fund, the *Pushouts* project explores why young people of color are failing to graduate from Philadelphia public schools and what is being done at the community level to address the problem.

- ZERODIVIDE PARTNERSHIP, CA, HI, NM, OR, UT and WA - ZeroDivide has partnered with several community media centers to create a new generation of youth technology users within underserved communities in six western states. The "Generation ZD Digital Literacy Program" targets low-income, minority, disabled, and otherwise underserved youth between the ages of 5-25, who have limited or no access to digital information technology in the home. These young people are served through a three-prong approach of a digital literacy skills curriculum; an online content creation and distribution program; and capacity-building and sustainability efforts at community anchor institutions within each participant state. Alliance members participating in ZeroDivide include Access Humboldt, CA; Akaku: Maui Community

Television, HI; Community Media Access Partnership (CMAP), CA; and Portland Community Media, OR.

While non-commercial community media centers work diligently to provide crucially needed and unique services to their local communities, community media centers continue to face serious obstacles that threaten their ability to reach core constituents and uphold their mission. By way of example, AT&T's discriminatory treatment of PEG channels is widely known and is the subject of the pending Petition for Declaratory Ruling filed by the Alliance and others in MB Docket 09-13. That Petition was filed more than three and a half years ago, yet the FCC has taken no action to date to protect the public by addressing the problems detailed in that Petition. Local residents expect PEG channels to be delivered in an equivalent manner to commercial broadcast and other cable channels, which is not the case with AT&T's U-Verse system.

On its U-Verse system, AT&T has moved community media channels to an inaccessible, subpar, marginally functional "Channel 99." As detailed in the above-reference Petition, AT&T's Channel 99 "PEG product" is inferior to broadcast channels carried on AT&T's U-verse system in virtually every way that matters to a viewer. If channels are made less accessible, and are deprived of basic functions viewers have come to expect, many subscribers now reached by community media will not receive valuable information. It's simply unacceptable with today's technological advances and AT&T's vast resources for local residents to be deprived of easy access to information critical for the education of our children, dissemination of health information, facilitation of job placement, and emergency information.

PEG channels are a critical and irreplaceable resource for our nation's local communities. If the Commission fails to take steps to preserve community media and prevent discriminatory industry practices targeted almost solely at PEGs, we have no doubt that other cable operators will follow suit to marginalize or effectively eliminate local community media access for U.S. citizens. The Commission should not and cannot stand idly by and allow that to happen.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Sylvia L. Strobel', with a stylized, cursive script.

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